

### **REMARKS**

Reconsideration of the present application is respectfully requested in view of the following remarks. Prior to entry of this response, Claims 1, 3-11, and 13-46 were pending in the application, of which Claims 1, 8, 18, and 27 are independent. In the Office Action dated April 20, 2006, Claims 1, 3-11 and 13-46 were rejected under 35 U.S.C. § 103(a). Following this response, Claims 1, 3-11, 13-17, 27-36, 39-44, and 47-57 remain in this application, Claims 47-57 being added by this Amendment and Claims 18-26, 37-38, and 45-46 being canceled without prejudice or disclaimer. Applicants hereby address the Examiner's rejections in turn.

I. Rejection of the Claims Under 35 U.S.C. § 103(a)

In the Office Action dated April 20, 2006, the Examiner rejected Claims 1, 3-11, 13-17, 27-32, and 41-44 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,259,782 ("*Gallant*") in view of U.S. Publication No. 2004/0072593 A1 ("*Robbins*").

While Applicants respectfully traverse this rejection, Claims 1, 6-8, 14-15, and 27-32 have been amended to place them in better form for consideration. The amendments are directed, for example, to address the Examiner's statement regarding usage of the term "operative." (See Office Action, page 3, lines 10-12.) In the Office Action, the examiner stated that the "operative" language "does not require steps to be performed nor limits the claim to a particular structure." Applicants disagree that such language did not serve to limit the claim, but has nonetheless revised the claims so that they do not contain any "operative" language. For instance, claim 1 now refers to

specific “means” for performing certain functions. Applicants respectfully submit that the amendments add no new matter nor do they narrow the claimed subject matter.

With the claims now clearly containing limitations that must be considered, the claims are novel and non-obvious over the references considered by the examiner. If the examiner continues to maintain a rejection of any of the claims, the examiner is respectfully requested to identify the corresponding “means” or other structure within the references. As explained below, the references do not disclose or teach the limitations of the claims, whereby the claims are in condition for allowance.

Claim 8 is patentably distinguishable over the cited art for at least the reason that it recites, for example, “enabling a media gateway to receive a call directed toward the second handset corresponding to the single telephone number on the second telecommunications network, the media gateway one of the wireless access points to generate a ring tone at the first handset, the second telecommunications network generating a ring tone corresponding to the call at the second handset, the media gateway linking the second telecommunications network to the wired data network.” Claims 1 and 27 each includes a similar recitation. Support for these recitations can be found in the specification at least on page 20, lines 17-25.

According to embodiments of the claimed invention, a single telephone number may be assigned to a handset in a public switch telephone network, in a regulated wireless network, and in an unregulated wireless network. (See specification, page 20, lines 10-16.) Consistent with embodiments of the claimed invention, in order to provide this functionality for utilizing the single telephone number with multiple handsets, an interface may be provided between the unregulated wireless network, the regulated

wireless network, and the public switch telephone network. (See specification, page 20, lines 17-19.) For example, a media gateway may interface with a signal transfer point (STP) within the public switch telephone network via a communication link. (See specification, page 20, lines 19-20.) The communication link may employ, for example, the signaling system 7 (SS7) switching protocol. (See specification, page 20, lines 21.) The STP may be a multi-port high speed packet switch that may be programmed to respond to routing information in an appropriate layer of the switching protocol and to route data packets to their intended destinations. (See specification, page 20, lines 21-24.)

In contrast, *Gallant* at least does not disclose ringing a call to two handsets assigned a single telephone number. In contrast, *Gallant* describes in column 5, lines 31 to 45, that each wireless terminal 110 has a wireless terminal identification number 112 which has a mobile identification number (MIN). Thus, each wireless device has a separate and unique telephone number. In column 5, lines 21 to 29, *Gallant* states that conventional wireline terminals can be employed which also have their own unique telephone numbers. On top of these separate telephone numbers, *Gallant* then deploys a permanent telephone number 180 and defines calling logic on how to route a call directed to that number 180 onto the telephone numbers for any of the wireline or wireless terminals. As is clear from this description, *Gallant* does not disclose or suggest that handsets may be assigned the same single telephone number.

Furthermore, *Gallant* at least does not disclose a media gateway that enables the system to operate with two handsets that have the same single telephone number. The media gateway is configured to enable ringing the call to two handsets assigned the

single telephone number, one handset on a telecommunications network and the other handset on an unregulated wireless network digital.

For example, *Gallant* discloses that a permanent telephone number is assigned for use by the subscriber. (See col. 4, lines 33-35.) Wireline routing instructions are assigned to a line of a wireline switch for allowing access to a wireline terminal. (See col. 4, lines 35-37.) A wireless terminal in *Gallant* is registered with the wireless switch. (See col. 4, lines 37-49.) Wireless routing instructions are obtained for allowing access to the wireless terminal. (See col. 4, lines 39-41.) The wireline routing instructions and the wireless routing instructions in *Gallant* are subsequently assigned to a telephone number to thereby directly associate the wireline terminal with the wireless terminal. (See col. 4, lines 43-43.) A calling priority scheme is assigned to the telephone number in order to designate which terminal to call when a request for call completion is made to the telephone number. (See col. 4, lines 43-46.)

In operation, *Gallant's* system receives an incoming call to the wireline switch requesting call completion to the telephone number. (See col. 4, lines 47-49.) In response to the incoming call, a request message is sent over a data signaling network from the wireline switch to a database management system of a global location register requesting a routing instructions for completing the call to the telephone number. (See col. 4, lines 49-53.) In response to the request message, in *Gallant*, a response message is sent over the data signaling network from the database management system to the wireline switch containing routing instructions for completing the call over the combined switching arrangement based upon the associated calling priority scheme for completing the call. (See col. 4, lines 53-53.) Lastly, the call is completed over the

combined switching arrangement in *Gallant* to at least one of the subscriber's terminals by using the routing instructions in the response message. (See col. 4, lines 59-62.)

Consequently, *Gallant* does not disclose the claimed media gateway at all. In *Gallant*, a request message is sent over a data signaling network from a wireline switch to a database management system of a global location register. *Gallant's* message requests routing instructions for completing a call to a telephone number. Furthermore, in *Gallant*, a combined switching arrangement is used to completed the call. Nowhere in *Gallant* does it disclose the claimed media gateway, much less a media gateway configured to operate with two handsets that have the same single telephone number.

Furthermore, *Gallant* discloses that a calling priority scheme 190, formed of a plurality of calling priorities, is assigned to a telephone number 180 in order to designate which of the subscriber's terminals to call when a request for call completion is made to a telephone number 180. (See col. 7, lines 15-18.) The calling priority scheme can be set to any number of priorities, including .... nearly parallel call completion to both a wireless terminal and a wireline terminal 200. (See col. 7, lines 18-26.) While *Gallant* discloses a calling priority scheme set for nearly parallel call completion to both a wireless terminal and a wireline terminal, *Gallant* does not disclose ringing a call to two handsets assigned a single telephone number. Rather *Gallant* discloses a calling priority scheme to designate which of the subscriber's terminals to call when a request for call completion is made to the telephone number.

In *Gallant*, ringing a call to two handsets assigned a single telephone number in not disclosed. Rather *Gallant* discloses a calling priority scheme that is assigned to the telephone number in order to designate which terminal to call when a request for call

completion is made to the telephone number. In *Gallant*, two handsets are not assigned a single telephone number, rather a calling priority scheme is disclosed to progressively call different devices in order to locate a person based on a pre-designated calling priority scheme. In other words, if the person is not located at the first device, a next device (indicated by the scheme) is called until the person is reached or all devices indicated by the scheme are called.

Furthermore, *Robbins* does not overcome *Gallant's* deficiencies. *Robbins* merely discloses that a user can enter and/or select rules for the processing or handling of calls based upon, for example, an originating caller, time and/or day of a call, whether a user is currently utilizing a desk phone or a subscriber device and whether the user is within a WLAN or a cellular network. (See paragraph [0062], lines 12-17.) A soft switch 134, in *Robbins*, can access a contact list and use categories and rules for call processing. (See paragraph [0062], lines 17-18.) For example, *Robbins's* soft switch 134 can use the contact list and categories to determine whether to route a call to a dual mode subscriber device 130, such as based on time of day, caller identity, a location of a dual mode remote unit, a location of the user and the like. (See paragraph [0062], lines 18-23.) A desk phone 136 can include a docking station for dual mode subscriber device 130, battery charging sockets and the like. (See paragraph [0062], lines 23-27.) In addition, desk phone 136 can incorporate access point functionality so that it is also a portion of a WLAN 132. (See paragraph [0062], lines 27-30.) In one mode, *Robbins's* soft switch 134 rings desk phone 136 for all incoming calls regardless of whether it rings dual mode subscriber device 130. (See paragraph [0062], lines 30-32.)

Accordingly, like *Gallant*, *Robbins* at least does not disclose ringing a call to two handsets assigned a single telephone number. Rather, *Robbins* merely discloses that soft switch 134 can use rules for call processing, such as ringing a desk phone for all incoming calls, regardless of whether a soft switch rings a dual mode subscriber device. Furthermore, *Robbins* fails to disclose two handsets that are assigned a single telephone number. In *Robbins*, soft switch 134 can use the contact list and categories to determine whether to route the call to dual mode subscriber device 130. *Robbins* is completely silent regarding ringing a call to two handsets assigned a single telephone number.

In sum, combining *Gallant* with *Robbins* would not have led to the claimed invention because *Gallant* and *Robbins*, either individually or in combination, at least do not disclose “enabling a media gateway to receive a call directed toward the second handset corresponding to the single telephone number on the second telecommunications network, the media gateway one of the wireless access points to generate a ring tone at the first handset, the second telecommunications network generating a ring tone corresponding to the call at the second handset, the media gateway linking the second telecommunications network to the wired data network,” as recited by Claim 8. Claims 1 and 27 each includes a similar recitation. Accordingly, independent Claims 1, 8, and 27 each patentably distinguishes the present invention over the cited art, and Applicants respectfully request withdrawal of this rejection of Claims 1, 8, and 27.

Moreover, dependent Claim 3 is allowable at least because it recites “wherein the ring tone is generated substantially simultaneously at the digital cordless handset and

the second handset." In contrast, and as stated above, *Gallant* merely discloses that a calling priority scheme 190 is assigned to a telephone number 180 in order to designate which of a subscriber's terminals to call when a request for call completion is made to a telephone number. (See col. 7, lines 15-18.) The calling priority scheme can be set to any number of priorities, including .... nearly parallel call completion to both a wireless terminal and a wireline terminal 200. (See col. 7, lines 18-26.) While *Gallant* discloses a calling priority scheme set for nearly parallel call completion to both a wireless terminal and a wireline terminal, *Gallant* does not disclose ring tone generated substantially simultaneously at a digital cordless handset and a second handset. Rather *Gallant* discloses a calling priority scheme that designates which of a subscriber's terminals to call when a request for call completion is made to a telephone number.

Dependent Claims 3-7, 9-11, 13-17, 28-32, and 41-44 are also allowable at least for the reasons described above regarding independent Claims 1, 8, and 27, and by virtue of their respective dependencies upon independent Claims 1, 8, 27. Accordingly, Applicants respectfully request withdrawal of this rejection of dependent Claims 3-7, 9-11, 13-17, 28-32, and 41-44.

## II. Rejection of Claims 18-26 and 45-46 Under 35 U.S.C. § 103(a)

In the Office Action, the Examiner rejected Claims 18-26 and 45-46 under 35 U.S.C. § 103(a) as being unpatentable over *Gallant* in view of *Robbins* further in view of U.S. Patent No. 6,373,817 ("*Kung*"). Claims 18-26 and 45-46 have been canceled



without prejudice or disclaimer rendering this rejection moot. Applicants respectfully request withdrawal of this rejection of Claims 18-26 and 45-46.

III. Rejection of Claim 33-36 and 39-40 Under 35 U.S.C. § 103(a)

In the Office Action, the Examiner rejected Claims 33-36 and 39-40 under 35 U.S.C. § 103(a) as being unpatentable over *Gallant* in view of *Robbins* in view of U.S. Patent No. 6,922,559 ("*Mohammed*"). Applicants respectfully traverse this rejection. Claims 34, 36, and 40 have been amended to place them in better form for consideration. The amendments are directed, for example, to address the Examiner's statement regarding using the term "operative." (See Office Action, page 3, lines 10-12.) Applicants respectfully submit that the amendments add no new matter nor do they narrow the claimed subject matter.

Dependent Claims 35-36 are patentably distinguishable over the cited art for at least for the reason that they include, due to their dependency on independent Claim 8, "enabling a media gateway to receive a call directed toward the second handset corresponding to the single telephone number on the second telecommunications network, the media gateway one of the wireless access points to generate a ring tone at the first handset, the second telecommunications network generating a ring tone corresponding to the call at the second handset, the media gateway linking the second telecommunications network to the wired data network." Dependent Claims 33-34 and 39-40 are patentably distinguishable over the cited art for at least for the reason that they each include a similar recitation due to their respective dependencies on independent Claims 1 and 27.

As stated above with respect to section I, *Gallant* and *Robbins*, individually or in any reasonable combination, at least do not disclose the aforementioned recitations. Furthermore, *Mohammed* does not overcome *Gallant's* and *Robbins'* deficiencies. *Mohammed* merely discloses that a base station 18 wirelessly transmits telephone signals from a standard Public Switched Telephone Network (PSTN) 20 and, if necessary, a standard Private Base exchange (PBX) 22, to a subscriber device 12. (See col. 3, lines 46-49.) Specifically, *Mohammed* discloses that when device 12 is within an unlicensed wireless service coverage area 16, originating base station 18 provides device 12 with wireless telephone service originating from PSTN 20 rather than a cellular network 14. (See col. 3, lines 49-53.)

Like *Gallant* and *Robbins*, *Mohammed* at least does not disclose ringing a call to two handsets assigned a single telephone number. Rather, *Mohammed* merely discloses that base station 18 provides device 12 with wireless telephone service when device 12 is within unlicensed wireless service coverage area 16. Consequently, *Mohammed* does not disclose two handsets assigned a single number much less simultaneous ringing two handsets having the same number. Furthermore, while *Mohammed* discloses base station 18, in no way does the disclosed base station function as a media gateway that enables a system to operate with two handsets that have the same single telephone number.

Combining *Gallant* with *Robbins* and *Mohammed* would not have led to the claimed invention because *Gallant*, *Robbins*, and *Mohammed*, either individually or in combination, at least do not disclose or suggest "wherein a call directed toward the second handset corresponding to the single telephone number on a

telecommunications network is received at a media gateway operative to enable the wireless access point to generate a ring tone at the digital cordless handset, the telecommunications network being operative to generate a ring tone corresponding to the call at the second handset, the media gateway configured to link to the telecommunications network to the wired data network," as included in dependent Claims 35-36. Dependent Claims 33-34 and 39-40 each includes a similar recitation. Accordingly, dependent Claims 33-36 and 39-40 patentably distinguish the present invention over the cited art, and Applicant respectfully requests withdrawal of this rejection of dependent Claims 33-36 and 39-40.

#### IV. Rejection of Claims 37-38 Under 35 U.S.C. § 103(a)

In the Office Action, the Examiner rejected Claims 37-38 under 35 U.S.C. § 103(a) as being unpatentable over *Gallant* in view of *Robbins* in view of *Kung* further in view of *Mohammed*. Claims 37-38 have been canceled without prejudice or disclaimer rendering this rejection moot. Applicants respectfully request withdrawal of this rejection of Claims 37-38.

#### V. New Claims

Claims 47-57 have been added to more distinctly define and to round out the protection for the invention to which Applicants are entitled. Applicants respectfully submit that these claims are allowable over the cited art and that they add no new matter.

VI. Conclusion

In view of the foregoing remarks, Applicants respectfully request the reconsideration and reexamination of this application and the timely allowance of the pending claims. The preceding arguments are based only on the arguments in the Office Action, and therefore do not address patentable aspects of the invention that were not addressed by the Examiner in the Office Action. The claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advanced without prejudice to other bases of patentability. Furthermore, the Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

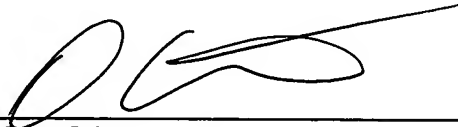
Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 13-2725.

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